

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEPHEN M. WILSON, *et al.*,

Plaintiffs,

v.

IMAGESAT INTERNATIONAL N.V., *et al.*,

Defendants.

Case No. 07 Civ 6176 (LTS)(DFE)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, pursuant to Federal Rule of Civil Procedure 12(b)(1)-(2), 12(b)(6), and 9(b), upon the accompanying Memorandum of Law and the Declarations of Yehoshua Eldar and Yair Ramati, upon Defendants' Joint Memorandum of Law, and the Declarations of Peter van Schilfgaarde, Dror Vigdor and Deborah Elman, and upon Section III of Defendant Elbit's Memorandum of Law (as they relate to claims 14, 15, and 19), and all other papers and proceedings herein, defendants Israel Aerospace Industries Ltd. ("IAI") and Yehoshua Eldar, will move this Court, before the Honorable Laura Taylor Swain, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an order dismissing with prejudice the Complaint and granting such other and further relief as this Court may deem just and proper.

Pursuant to the Court's July 26, 2007 Order, plaintiffs shall respond no later than December 14, 2007, and defendants shall reply no later than January 14, 2008.

Pursuant to Section 2(B) of the Court's rules, IAI and Yehoshua Eldar certify that they have used their best efforts to informally resolve the matters discussed in the accompanying memorandums of law.

Dated: October 15, 2007
New York, New York

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